

# **EXHIBIT F**

## COVINGTON

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October 5, 2023

Lesley E. Weaver  
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Joshua D. Samra  
Bleichmar Fonti & Auld LLP

Re: *White, et al. v. Samsung Electronics America, Inc.*, Civil Action No. 17-1775 (D.N.J.)

Dear Counsel:

Defendant Samsung Electronics America, Inc. (“SEA”) today is making its third production in response to Plaintiffs’ requests for production in this matter and pursuant to the Court’s September 15, 2023 order (ECF No. 241). The materials bear bates number SEA-00045345, and include the viewing history data within SEA’s possession, custody, or control for two of Plaintiffs’ Smart TVs. The materials are sufficient to show the categories of data collected from Samsung Smart TVs through ACR technology that are within SEA’s possession, custody, or control. The production may be downloaded via an FTP link that will be provided to you through the Kiteworks application. The password to access the production is: k7z^IoI2\*I7k.

SEA performed a search for data in its possession, custody, or control collected through ACR associated with the PSID that Plaintiffs provided for White’s Florida Smart TV (PSID: AIUTZE7TWDIXQVN353MK313FJ3ELALXY), but did not locate any such data. SEA also conducted a search for a data “schema” in its possession, custody, or control relating to ACR data and did not locate any responsive documents.

This production includes material designated as “Confidential” pursuant to the Discovery Confidentiality Order entered by the Court on March 28, 2018. *See* ECF No. 65. Such materials may be used or disclosed only as specified in the Order.

By making this production, SEA is not waiving any objections to Plaintiffs’ requests for production, and is not committing to collect, review, or produce any further similar documents.

Sincerely,

/s/ Jordan S. Joachim

Jordan S. Joachim

cc: Counsel of record